

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: 5171 CAMPBELLS LAND CO., INC., Debtor.	Case No. 19-22715-CMB Chapter 11
5171 CAMPBELLS LAND CO., INC., Movant, v. ASCENTIUUM CAPITAL, LLC, IEMFS, Ltd. d/b/a GSG FINANCIAL, HITACHI CAPITAL AMERICA CORP., TRI STATE EQUIPMENT CO., INC., WESBANCO BANK, INC., STORE CAPITAL ACQUISITIONS, LLC, STORE MASTER FUNDING XIII, LLC, US FOOD, INC., VISION FINANCIAL GROUP, INC. , PENNSYLVANIA DEPARTMENT OF REVENUE, THE NEW YORK DEPARTMENT OF TAXATION AND FINANCE, THE OHIO DEPARTMENT OF TAXATION and THE INTERNAL REVENUE SERVICE. Respondents.	Related to Doc. No. 149

**LIMITED OBJECTION TO DEBTOR'S EXPEDITED MOTION
FOR SALE OF PERSONALTY FREE AND CLEAR OF
ALL LIENS, CLAIMS AND ENCUMBRANCES**

AND NOW COMES Perkins & Marie Callender's, LLC ("PMC"), by and through its undersigned counsel, and files this *Limited Objection to Debtor's Expedited Motion for Sale of Personalty Free and Clear of All Liens, Claims and Encumbrances* ("Limited Objection"), as follows:

1. On or about June 8, 2019 (the “Petition Date”), 5171 Campbells Land Co., Inc. (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, 11 U.S.C. § 101, et seq. (as amended, the “Bankruptcy Code”).

2. On July 19, 2019, the Parties filed, and this Court approved, that certain Revised Stipulation and Consent Order (as amended by the First Amendments described in Paragraph 3 below, the “Stipulation,” Doc. No. 72).

3. On August 1, 2019, the Parties filed, and this Court approved, Amendments to Revised Stipulation and Consent Order (the “First Amendments,” Doc. No. 106).

4. On or about August 22, 2019, the Debtor filed an Expedited Motion for Sale of Personalty Free and Clear of all Liens, Claims and Encumbrances (“Sale Motion”) [Doc. No. 149].

5. PMC continues to negotiate with the Debtor regarding terms under which the Committee will support the Motion. Those negotiations include additional amendments to the Stipulation necessitated by the terms of proposed sale and changes to the proposed order for approval of the Sale Motion.

6. Although it is hopeful that negotiations will be successful, PMC reserves the right to object to any of the terms of the proposed sale.

WHEREFORE, PMC respectfully requests that this Honorable Court enter an Order denying the Sale Motion if PMC’s negotiations with the Debtor are not successful.

[SIGNATURE ON NEXT PAGE]

Dated: August 28, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the within Limited Objection on all counsel of record via the Court's CM/ECF system, as listed below, on August 28, 2019.

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